



Privacy Impact Assessment

Human Resources Center (HRC)

Revision: 0.0.3

Food Safety and Inspection Service (FSIS)

Date: April 2009



Document Information

Owner Details	
Name	Louise Fox
Contact Number	612-370-2025
E-mail Address	louise.fox@fsis.usda.gov

Revision History			
Revision	Date	Author	Comments
0.0.1	September 2007	Andrea Livero-Scott for Dakota Consulting	Initial draft for the HRC System.
0.0.2	September 21, 2007	Andrea Livero-Scott for Dakota Consulting	Update to initial draft based on comments received from Kevin O'Donovan.
0.0.3	April 28, 2009	Olukayode Adeyosoye	Update PIA to 2008 template.

Distribution List			
Name	Title	Agency/Office	Contact Information



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1 System Information

System Information	
Agency:	Food Safety and Inspection Services (FSIS)
System Name:	Human Resources Center (HRC)
System Type:	<input type="checkbox"/> Major Application <input checked="" type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low



<p>Description of System:</p>	<p>The HRC is a general support system (GSS) that consists of 41 Minor Applications which provide human resources-related functions for the Food Safety and Inspection Service's (FSIS) Office of Management (OM) / Human Resources Division (HRD) / HRFO. Users of the data are primarily internal FSIS/OM/HRD/HRFO employees. HRC also consists of ad-hoc data required for operations of HRFO, but not contained within any particular minor application.</p> <p>The HRC supports the mission of the HRD by allowing staff to:</p> <ul style="list-style-type: none">• Track Electronic Official Personnel Folder (EOPF) data and requests for EOPF data.• Track EOPF files that are received from and sent to the National Archive Record Center.• Track EOPF files that are sent to the USDA office in Washington, DC.• Generate list of EOPFs that have been terminated or removed.• View employee data, SF-50 data, run reports and print labels.• Maintain a detailed record on the lifecycle of the SF-52. Allows users to run reports, track and store data on a SF-52.• Store position sensitivity information.• Track an applicant's medical clearance information; and generate letters to applicants, medical review officers, physicians, and District Offices.• Keep track of employees, including consumer safety inspectors, who wish to be reassigned to a new duty station.• Track recurring promotions and assist employees with repromotion placement to ensure that employees receive due consideration for placement in positions at grades from which they were demoted or are otherwise entitled to special consideration.• Track vacancy announcement requests. Lists all positions – vacant or occupied – within FSIS. If a position is filled by an employee, the application lists name, location job number and other job related info. If a position is vacant, the application lists date vacant, location, job number and other job related info.• Track employees who are on the Alternative Duty Program or the Work Hardening Program (i.e., return to work programs).• Compute retirements and benefits information.• Provide awards information and allow for the processing of monetary awards and time-off hours.• Track employee milestones (e.g., 10, 20, 25, etc. years of service).• Track the receipt of and submission of new claims forms to the Department of Labor.• Provide earnings and leave statements.• Access background checks on potential applicants.• Track credit card delinquencies.• Track and manage the garnishment program.• Create identification (ID) badges.• Track all incoming overnight mail and special services mail.• Track inventory in the Mailroom.
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Privacy Impact Assessment for Human Resources Center (HRC)

Who owns this system? (Name, agency, contact information)	Louise Fox USDA/FSIS/OM/OCHCO/HRD/HRFO 612-370-2025 louise.fox@fsis.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Christopher Douglas FSIS 202-418-8881 christopher.douglas@fsis.usda.gov
Who completed this document? (Name, agency, contact information)	Christopher Douglas FSIS 202-418-8881 christopher.douglas@fsis.usda.gov



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	The Minor Applications that comprise the HRC collect various types of data, in support of the Human Resources mission. Refer to Section 1.1 above for additional information regarding the type of information in the system.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	



No.	Question	Response
4.1	What data is being collected from the customer?	Personal Information: <input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Date of birth <input type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input checked="" type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input checked="" type="checkbox"/> Mailing address <input checked="" type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input checked="" type="checkbox"/> Medical records numbers <input checked="" type="checkbox"/> Medical notes <input checked="" type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input checked="" type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input checked="" type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input checked="" type="checkbox"/> E-mail address <input type="checkbox"/> Education records <input checked="" type="checkbox"/> Military status and/or records <input checked="" type="checkbox"/> Employment status and/or records <input type="checkbox"/> Membership in professional, trade or other organizations <input type="checkbox"/> Certifications, licenses, accreditations held <input checked="" type="checkbox"/> Foreign activities and/or interests <input checked="" type="checkbox"/> Other: Date of injury <input checked="" type="checkbox"/> Other: Return to work information <input checked="" type="checkbox"/> Other: Dates of employment <input checked="" type="checkbox"/> Other: Dates <input checked="" type="checkbox"/> Other: Date of retirement <input checked="" type="checkbox"/> Other: Signatures <input checked="" type="checkbox"/> Other: Service dates <input checked="" type="checkbox"/> Other: Tenure <input checked="" type="checkbox"/> Other: Retirement <input checked="" type="checkbox"/> Other: Handicap <input checked="" type="checkbox"/> Other: Gender <input checked="" type="checkbox"/> Other: Union Status <input checked="" type="checkbox"/> Other: Benefits Information Date: April, 2009 <input checked="" type="checkbox"/> Other: Duty station locality / codes <input checked="" type="checkbox"/> Other: Series / Grade <input checked="" type="checkbox"/> Other: SF-50 Actions / History of Actions
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No.	Question	Response
4.2	What USDA agencies are providing data for use in the system?	
4.3	What state and local agencies are providing data for use in the system?	<ul style="list-style-type: none">National Archive Record Center
4.4	From what other third party sources is data being collected?	
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<ul style="list-style-type: none">Yes, data is manually entered into the system and verified by team leads.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	

2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No



No.	Question	Response
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	• No procedures documented
14.3	Where are these procedures documented?	• No procedures documented
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	



No.	Question	Response
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input type="checkbox"/> Yes <input type="checkbox"/> No

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	<ul style="list-style-type: none">• New claims forms are submitted to the Department of Labor – unsure how this data is used.• NFC uses the data for tracking open and closed garnishments.
17.2	Who is responsible for assuring the other agency properly uses the data?	<ul style="list-style-type: none">• No one has been assigned this responsibility.
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	<input checked="" type="checkbox"/> Users <input checked="" type="checkbox"/> Administrators <input type="checkbox"/> Developers <input type="checkbox"/> Contractors <input type="checkbox"/> Others: <input type="checkbox"/> Others: <ul style="list-style-type: none">• Only internal HRFO users have access to the data for day-to-day operations and support of the mission.



No.	Question	Response
21	How will user access to the data be determined?	<ul style="list-style-type: none">Access is provided only on a need-to-know basis and if the job requires it.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22	How will user access to the data be restricted?	
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Only internal users have access to the data. Access controls are in place.
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <ul style="list-style-type: none">Consolidation and linkage of files and systemsDerivation of dataAccelerated information processing and decision makingUse of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	

No.	Question	Response
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input type="checkbox"/> No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

- 1. Yes**

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF
INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Human Resources Center (HRC)

(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager/Owner
OR Project Representative
OR Program/Office Head.

Date

Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

Date

Agency OCIO

Date